

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MICHAEL COREY JENKINS
EDDIE TERRELL PARKER

PLAINTIFFS

V.

CAUSE NO. 3:23-cv-374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

DEFENDANT JERRERY MIDDLETON'S RESPONSE
PLAINTIFFS' REQUEST FOR ADMISSIONS

1. The existence of the GOON SQUAD, and its coin logo, was well known to personnel at all levels in the Rankin County Sheriff's Department including Sheriff Bailey.

Response to No. 1: Admit that the coin existed but deny that there was a GOON SQUAD other than the nickname for the shift I was on and deny the rest as I don't know what anyone knew.

2. As a matter of routine, your actions as deputy sheriff's were not closely supervised by Sheriff Bailey.

Response To No. 2: Admit

3. Instead of close supervision, Sheriff Bailey left us deputies to our own devices so long as crime was kept in check.

Response To No. 3: Admit

4. As a member of the Goon Squad, I was expected to use whatever force was necessary to maintain law and order as I deemed appropriate.

Response To No. 4: Deny

5. Members of the GOON SQUAD were not held accountable for using force or causing injuries to the people that they arrested or detained.

Response to No. 5: Deny

6. The GOON SQUAD operated on the night shift because that is when we believed that criminals were more active and because our misdeeds would be less visible to the public.

Response To No. 6: Deny

7. We had a culture in the Sheriff's Office that rewarded aggressiveness, a take charge attitude and a willingness to do whatever needed to be done to achieve the goals sought.

Response To No. 7: Deny

8. In the environment that existed in the Sheriff's Department, we were led to believe that no adverse action would be taken for alleged excessive force or constitutional violations while I was working on the GOON SQUAD.

Response To No. 8: Deny

Respectfully submitted,
Jeffery Arwood Middleton


Clarence McDonald Leland MB# 9739

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Certificate of Service

I hereby certify that I have emailed the above Response To Request For Admissions to:

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